



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SK  
F. #2016R02228

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 7, 2020

By FedEx, Email, and ECF

Andrew J. Frisch  
One Penn Plaza, Suite 5315  
New York, NY 10119

Re: United States v. Aleksandr Zhukov  
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Frisch:

The government provides supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure and additional pretrial disclosures.

Enclosed please find the following:

- LinkedIn records for individuals other than the defendant, Bates-stamped **ZHU006610 to ZHU006818**;
- Screenshots of portions of Facebook's website for developers, Bates-stamped **ZHU006819 to ZHU006820**;
- A record from Maxmind, Bates-stamped **ZHU006821 to ZHU006824**;
- Logs exported from the "git" files previously produced to you, Bates-stamped **ZHU006825 to ZHU006828**; and
- Bank records from Expobank for the Ksandria Group account, Bates-stamped **ZHU006829 to ZHU008391**.

The government previously disclosed information about a "git" related to the defendant's scheme that had been posted online. ECF No. 1, ¶¶ 38-39. Enclosed are additional records related to the posting, Bates-stamped **ZHU008392 to ZHU008401**.

In addition, the government hereby provides notice that its expert, LL, may testify regarding the contents of the adw0rd.yandex.ru@gmail.com email account; her analysis of those emails is enclosed as 3500-LL-5. The government also hereby provides

notice that it may call an additional expert in its rebuttal case; the identity of this expert and his qualifications are set forth in his curriculum vitae, enclosed as 3500-AB-1.

Finally, the government also hereby provides written notice that it intends to offer business records provided by MaxMind, 24Shells, and Expobank via certification pursuant to Federal Rule of Evidence 902(11) and 18 U.S.C. § 3505. Those certifications are enclosed.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By: /s/  
 Saritha Komatireddy  
 J. Artie McConnell  
 Alexander F. Mindlin  
 Assistant U.S. Attorneys  
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## Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)